

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

JULIE HODGE,)	
)	1:24-cv-02226
Plaintiff,)	
)	
and)	Judge Jorge L. Alonso
)	
NORTHEAST ILLINOIS REGIONAL)	
COMMUTER RAILROAD)	
CORPORATION, d/b/a METRA)	
)	
Defendant.)	

**PARTIES' AGREED MOTION FOR EXTENSION OF
TIME TO COMPLETE FACT DISCOVERY**

Plaintiff, JULIE HODGE, and Defendants NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA by and through their undersigned attorneys respectfully requests that this Court extend the deadline to complete fact discovery and to file dispositive motions and in support of this motion states the following:

1. The initial Complaint in this matter was filed on March 18th, 2024.
2. On March 19, 2024, Plaintiff filed her First Amended Complaint.
3. On May 6, 2024, Plaintiff filed her Second Amended Complaint in this matter.
4. On August 9, 2024, the Defendants filed an Answer to Plaintiff's Second Amended Complaint.
5. On June 25, 2024, this Honorable Court set the deadline for the close of fact discovery as December 20, 2024.

6. Written discovery has been exchanged in this matter.
7. On December 16, 2024, the parties filed the motion for an extension of time to complete discovery.
8. On December 26, 2024, this Honorable Court granted the parties' motion for an extension of time to complete discovery, extending the time to complete discovery until March 31, 2025.
9. In January, the Plaintiff informed her counsel of an upcoming surgery and a subsequent 8-week recovery period.
10. Due to the Plaintiff's unexpected health related matter, the parties have been unable to schedule depositions in this matter, and Defendant's counsel has not yet received executed HIPAA and Illinois Mental Health Confidentiality Act authorizations from Plaintiff so that it can subpoena Plaintiff's medical records, which are at issue in this matter.
11. Accordingly, the parties need more time to complete fact discovery and a new deadline for dispositive motions.
12. The parties request up to and including May 30, 2025 to complete fact discovery and a dispositive motion deadline 30-45 days after the completion of discovery.
13. No prejudice will be suffered by either party if this Honorable Court were to grant the requested extension.

WHEREFORE, JULIE HODGE, and Defendants NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA by and through their undersigned attorneys respectfully requests that this Court grant an extension of the deadline to complete witness depositions up to and including May 30, 2025.

Dated: February 26, 2025

Respectfully Submitted,

/s/Kendra D. Spearman

Kendra D. Spearman

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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2025, I served the foregoing document upon all counsel of record by filing a copy with the Clerk of the Northern District of Illinois using the Court's electronic filing system.

/s/Kendra D. Spearman
Kendra D. Spearman
Attorney for the Plaintiff